

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

KAY STEPHENS, Individually, and on behalf
of themselves and all others similarly situated,

Plaintiff,

v.

UNITED SERVICES AUTOMOBILE
ASSOCIATION, et al.,

Defendants.

Case No.: [_____]

DECLARATION OF MR. SACRAMENTO FAJARDO

STATE OF TEXAS

COUNTY OF BEXAR

I, Sacramento Fajardo, hereby declare that:

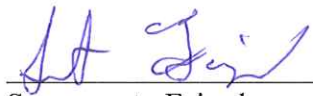
1. I am Business Process Consultant Senior for United Services Automobile Association (“USAA”). I am over the age of 18 years, have personal knowledge of the statements in this declaration, and I am authorized to make the statements in this declaration.

2. Based upon a review of USAA’s records, kept contemporaneously in the ordinary course of business by persons whose job duties require them to maintain such records, during the period of February 4, 2014, to February 24, 2020, USAA adjusted and settled approximately 15,413 first-party, total loss claims for its Washington insureds under either the comprehensive or collision coverages of automobile insurance policies.

3. The adjustment and settlement of approximately 15,413 first-party, total loss claims resulted in payments to USAA insureds of \$142,751,849.45 under either the comprehensive or collision coverages of their automobile insurance policies.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2020.

A handwritten signature in blue ink, appearing to read "SA Fajardo", is written over a horizontal line.

Sacramento Fajardo